

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

\_\_\_\_\_  
BETTY'S BEST, INC.,  
Plaintiff,

v.

\_\_\_\_\_  
THE INDIVIDUALS, PARTNERSHIPS,  
AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON  
SCHEDULE "A,"  
Defendants  
\_\_\_\_\_

Case No. 1:23-cv-22322-KMW

**DECLARATION OF BAOHUA ZHANG**

I, Baohua Zhang, declare as follows:

1. I am over the age of 18. I am a resident of Nanchang, China. I am the Chief Marketing Officer of Zero-Miracle Network Limited ("Zero-Miracle"), a company registered and headquartered in Hong Kong. The Company's business address is Flat/Rm 705,7/F, Fa Yuen Commercial Building, No.75, Fa Yuen Street, Mong Kok, KLN, Hong Kong. I make this declaration in support of the opposition to the motion for preliminary injunction ("Motion") filed by Plaintiff Betty's Best, Inc. ("Plaintiff") in the lawsuit against numerous websites ("Lawsuit"). I have personal knowledge of the following and, if called as a witness, could competently testify to the same.

2. Zero-Miracle has expertise in e-commerce operations, both in directly engaging in such business and supporting other companies that do so.

3. Zero-Miracle also acts as a service company to other e-commerce companies, including some of companies that operate websites alleged to be defendants in this Lawsuit, as detailed below. Zero-Miracle provides services such as logistics, operations, and financial management support, for other companies' e-commerce operations. These companies are separately owned and registered, and they maintain ultimate control and ownership of the websites affiliated with them. As relevant here, these companies include Elay E-commerce Co., Limited, Danceage Network Limited, Shenzhen Jijing Network Technology Co., Ltd., Nanchang Huimeng Network Technology Co., Ltd., Nanchang Sikerui Technology Co., Ltd., Nanchang Laifei Technology Co., Ltd., and Wuhan Quanda Network Technology Co., Ltd. These companies own the defendant websites associated with them in the Chart of Entities, Sales & Restrained Amounts submitted with Defendants' opposition to Plaintiff's Motion ("Entities Chart"). Zero-Miracle also owns and operates certain defendant websites as shown in the Entities Chart.

4. Elay E-commerce Co., Limited ("Elay") is a Hong Kong company with a business address of Room1405c,14/F., Lucky Centre, 165-171 Wanchai Road, Wanchai Hong Kong.

5. Danceage Network Limited ("Danceage") is a Hong Kong company with a business address of Flat/Room 705, 7/F, Fa Yuen Commercial Building, No.75, Fa Yuen Street, Mong Kok, KLN, Hong Kong.

6. Shenzhen Jijing Network Technology Co., Ltd. ("Shenzhen Jijing") is a Chinese company with a business address of Room 6C, Building 4, Dachong Business Center (Phase III),



Dachong Community, Yuehai Street, Nanshan District, Shenzhen, China.

7. Nanchang Huimeng Network Technology Co., Ltd. (“Nanchang Huimeng”) is a Chinese company with a business address of Room 1905, Commercial Building #39, Greenland Metropolis, No. 2977 Ziyang Avenue, Nanchang High-tech Industrial Development Zone, Nanchang City, Jiangxi Province, China.

8. Nanchang Sikeirui Technology Co., Ltd. (“Nanchang Sikeirui”) is a Chinese company with a business address of Room 1806, 18th Floor, Office Building B#, Yunzhong City, No. 3399 Ziyang Avenue, Nanchang High-tech Industrial Development Zone, Nanchang City, Jiangxi Province, China.

9. Nanchang Laifei Technology Co., Ltd. (“Nanchang Laifei”) is a Chinese company with a business address of Room 4106, Office Building A1#, Greenland Central Plaza, No. 998 Hongdu Avenue, Honggutan District, Nanchang City, Jiangxi Province, China.

10. Wuhan Quanda Network Technology Co., Ltd. (“Wuhan Quanda”) is a Chinese company with a business address of Room 02, Floor 6, R&D Building, No. 7, Phase 3, Modern International Design City, No. 41 Guangxi Avenue, East Lake New Technology Development Zone, Wuhan, China.

11. For Zero-Miracle, Elay, Danceage, Shenzhen Jijing, Nanchang Huimeng, Nanchang Sikeirui, Nanchang Laifei, and Wuhan Quanda, from my review of records, the Entities Chart accurately reflects (1) these Defendants’ sales of products alleged to be infringing from websites under their control (both the total numbers globally, and the numbers (if any) from sales to Florida addresses), and (2) their amount of assets restrained by the TRO in this case. Separately,

the “Compendium of Sales” submitted with Defendants’ opposition accurately includes correct sales information for these Defendants’ and their websites. For each of these Defendants, given operational costs, the profit margin for defendants’ sales of the products such as the one at issue is approximately 8%.

12. Before learning about the Lawsuit, neither I nor, to my knowledge, anyone affiliated with these Defendants knew that any photographs or other alleged intellectual property rights at issue in this Lawsuit were copyrighted or otherwise protected. To my knowledge, Plaintiff never contacted any of these Defendants.

13. These Defendants each have no connections to Florida. They have no offices or employees in Florida, and do not specifically target Florida in any advertising.

14. These Defendants utilize PayPal accounts to operate their business. The temporary restraining order in this case ordered the freezing of those PayPal Accounts.

15. These Defendants are suffering extreme harm from the freezing of their PayPal accounts, and they will continue to suffer such harm if the injunction is not dissolved or significantly reduced. The PayPal accounts are essential to Defendants’ business operations.

16. These Defendants have already ceased selling the products at issue, and do not intend to restart selling the Products. The products generated a very small percentage of these Defendants’ revenue. All or virtually of the frozen assets of these Defendants are proceeds from sales of products that are entirely unrelated to the product at issue.

17. Because of the vastly overbroad asset restraint, these Defendants are at risk of being held liable for defaulting on other obligations. Moreover, these Defendants are suffering an



incalculable loss of reputation in the market. The Defendants have invested significant amounts of effort and money to establish themselves in the marketplace, and their inability to continue operating their businesses through their now-frozen PayPal accounts is causing an immeasurable loss of corporate reputation and difficulty in managing business operations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 9, 2023 at Nanchang, China.

Baohua Zhang  
Baohua Zhang